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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARIE
HAYRAPETIAN IN SUPPORT OF JOINT
SUBMISSION RE: SEALING PORTIONS
OF ORDER ON PLAINTIFFS' RENEWED
REQUEST TO DEPOSE SUNDAR PICHAJ
(DKT. 758)**

Judge: Hon. Susan van Keulen, USMJ

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Joint
7 Submission Re: Sealing Portions of the September 26, 2022 Order on Plaintiffs’ Renewed Request
8 to Depose Sundar Pichai (Dkt. 758). In making this request, Google has carefully considered the
9 relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes
10 this request with the good faith belief that certain information sought to be sealed consists of
11 Google’s confidential information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Order on
13 Plaintiffs’ Renewed Request to Depose Sundar Pichai (Dkt. 758).

14 4. The information requested to be sealed contains Google’s non-public, sensitive
15 confidential and proprietary business information that could affect Google’s competitive standing
16 and may expose Google to increased security risks if publicly disclosed, including various types of
17 Google’s internal projects and their proprietary functionalities, which Google maintains as
18 confidential in the ordinary course of its business and is not generally known to the public or
19 Google’s competitors.

20 5. Such confidential information reveals Google’s internal systems and operations and
21 falls within the protected scope of the Protective Order entered into this action. *See* Dkt. 81 at 2-3.

22 6. Public disclosure of such confidential information could affect Google’s competitive
23 standing as competitors may alter their system designs and practices relating to competing products,
24 time strategic litigation, or otherwise unfairly compete with Google.

25 7. On October 3, 2022, the parties conferred on the proposed redactions to the Order.
26 Plaintiffs take no position on sealing Google’s proposed redactions.

27 8. For these reasons, Google respectfully requests that the Court order the identified
28 portions of the Order to be sealed.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in Los Angeles, California on October 3, 2022.

3
4 DATED: October 3, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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6
7 By /s/ Marie Hayrapetian

8 Marie Hayrapetian

9 Attorney for Defendant
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